

January 31, 2020

VIA ECF

Hon. Katharine Parker
United State Magistrate Judge
Southern District of New York
500 Pearl Street, Room 1950
New York, NY 10007

MEMO ENDORSED

Re: Hernandez v. Tamrak Management, Inc.
Docket No. 19 Civ. 6825 (PAE)(KHP)

Dear Judge Parker:

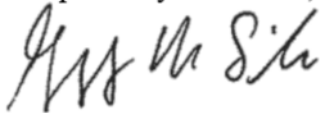
We are counsel for the parties in the above-referenced matter and write jointly to respectfully request that the Court adjourn the Initial Case Management Conference currently scheduled for February 19, 2020 and instead schedule a settlement conference before Your Honor. This is the second request for an adjournment of the Initial Case Management Conference, the first of which was granted.

As Your Honor may recall, Defendant's counsel was recently retained on January 15, 2020 and requested an adjournment of the conference that had been scheduled for January 21, 2020. The parties conferred this week to continue settlement discussions that had been ongoing since before Defendant retained counsel. As a result of these discussions, counsel for both parties believe that the parties could benefit from an early settlement conference before Your Honor, prior to the parties expending resources on discovery or pre-trial disclosures that would be required in advance of an Initial Case Management Conference.

Therefore, the parties respectfully request that the Court adjourn the Initial Case Management conference *sine die* and either schedule a telephone conference with Your Honor to discuss dates for a settlement conference or have Your Honor's clerk provide some dates that the Court is available for a settlement conference.

We appreciate Your Honor's time and attention to this matter.

Respectfully submitted,

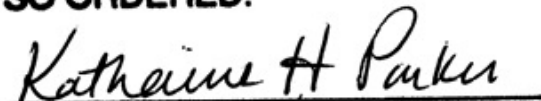


Gregory N. Filosa
Counsel for Plaintiff

/s/ Joshua Beldner
Joshua Beldner
Counsel for Defendant

The Initial Case Management Conference in this matter scheduled for February 19, 2020 is hereby adjourned *Sine Die*. A settlement conference in this matter is scheduled for Thursday, March 3, 2020 at 10:00 a.m. in Courtroom 17-D, United States Courthouse, 500 Pearl Street, New York, New York. Parties must attend in-person with their counsel. Corporate parties must send the person with decision making authority to settle the matter to the conference. The parties are instructed to complete the Settlement Conference Summary Report and prepare pre-conference submissions in accordance with the Judge Parker's Individual Rules of Practice. Pre-conference submissions must be received by the Court no later than February 25, 2020 by 5:00 p.m.

SO ORDERED:

A handwritten signature in black ink that reads "Katharine H. Parker". The signature is written in a cursive style and is positioned above the printed name and title.

**HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE**

02/18/2020